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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

IN THE MATTER OF THE CRIMINAL  
COMPLAINT IN U.S. v. DONALD STEPHEN  
KYLE AND ARREST WARRANT

NO: 4:21-mj-71116-MAG

MOTION TO SEAL AND  
~~PROPOSED~~ SEALING ORDER

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**FILED**

Jul 02 2021

SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND

1 The United States respectfully moves this Court to seal this Motion, any Order ruling on this  
2 Motion, the United States' Criminal Complaint in U.S. v. DONALD STEPHEN KYLE, the Arrest  
3 Warrant thereon, and any other related paperwork in the above-referenced matter until further Order of  
4 this Court. The United States seeks this sealing order to avoid prematurely revealing an ongoing  
5 criminal investigation, guard against fugitives, and better ensure the safety of agents and others.

6 The United States also requests that, notwithstanding any sealing order, the Clerk of the Court be  
7 required to give copies of the sealed documents to employees of the United States Attorney's Office,  
8 and that they be permitted to serve working copies on the Federal Bureau of Investigation Special  
9 Agents, Task Force Officers, and other investigative and law enforcement officers of the United States,  
10 federally deputized state and local law enforcement officers, and other government and contract  
11 personnel acting under the supervision of such investigative or law enforcement officers as necessary to  
12 effectuate the Court's Order.

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14 DATED: July 1, 2021

Respectfully submitted,

STEPHANIE M. HINDS  
Acting United States Attorney

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18 /s/ Jonathan U. Lee  
JONATHAN U. LEE  
Assistant United States Attorney

**SEALING ORDER**

FOR GOOD CAUSE SHOWN, it is hereby ordered that the Motion to Seal, this Order, the United States' Criminal Complaint in U.S. v. DONALD STEPHEN KYLE, the Arrest Warrant thereon, and any other related paperwork in the above-referenced matter until further Order of this Court. and all other related paperwork in the above-referenced matter be filed under seal until further Order of this Court. Endorsed filed copies shall be provided to the United States Attorney's Office, and they are permitted to serve working copies on Federal Bureau of Investigation Special Agents, Task Force Officers, and other investigative and law enforcement officers of the United States, federally deputized state and local law enforcement officers, and other government and contract personnel acting under the supervision of such investigative or law enforcement officers as necessary to effectuate the Court's Order.

IT IS SO ORDERED.

DATED: July 2<sup>nd</sup>, 2021

  
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HONORABLE SUSAN VAN KEULEN  
United States Magistrate Judge